

1 TERRY ROSS, CASB No. 58171
terry.ross@kyl.com
2 AUDETTE PAUL MORALES, CASB No. 216631
audette.morales@kyl.com
3 KEESAL, YOUNG & LOGAN
A Professional Corporation
4 400 Oceangate, P.O. Box 1730
Long Beach, California 90801-1730
5 Telephone: (562) 436-2000
Facsimile: (562) 436-7416
6
7 Attorneys for Defendants
WACHOVIA SECURITIES, LLC and MARK WIELAND

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 VIOLETTA ETTARE,) Case No. C-07-04429-JW (PVT)
14)
Plaintiff,) **DECLARATION OF PAUL WALDMAN**
15 vs.) **IN SUPPORT OF DEFENDANTS'**
16) **JOINT OPPOSITION TO**
JOSEPH E. BARATTA, an individual,) **PLAINTIFF'S MOTION TO REMAND**
17 TBIG FINANCIAL SERVICES, INC., form) **AND MOTION FOR LEAVE TO**
of business unknown, WACHOVIA) **AMEND REMOVAL NOTICE**
18 SECURITIES, LLC, a Delaware Limited)
Liability Company, MARK WIELAND, an) Date: Monday, December 3, 2007
19 individual, and DOES 1-25,) Time: 9:00 a.m.
20) Place: Courtroom 8, 4th Floor
Defendants.)
)

21
22 I, PAUL WALDMAN, declare as follows:

23 1. I have personal knowledge of the facts herein, and if called to testify
24 as a witness, could and would testify competently thereto.

25 2. I am a duly elected officer of Wachovia Securities, LLC ("Wachovia
26 Securities") in New York holding the titles of Senior Vice President and Corporate
27 Counsel.

28 3. Since before Plaintiff VIOLETTA ETTARE filed her complaint in this

1 matter on July 13, 2007, and through the present, Wachovia Securities has been a
2 limited liability company organized under the laws of Delaware, having its principal
3 place of business in Richmond, Virginia.

4 4. Since before July 13, 2007 and through the present, Wachovia
5 Securities has been owned entirely by Wachovia Securities Financial Holdings, LLC
6 ("WSFH").

7 5. Since before July 13, 2007 and through the present, WSFH has been
8 a limited liability company organized under the laws of the State of Delaware and has
9 had its principal place of business in Richmond, Virginia.

10 6. Since before July 13, 2007 and through the present, WSFH has
11 consisted of two members: Prudential Securities Group Inc. ("PSG"), which has a 38%
12 interest in WSFH, and Wachovia Securities Holdings, LLC ("WSH"), which has a 62%
13 interest in WSFH.


14 7. Since before July 13, 2007 and through the present, WSH has been
15 organized under the laws of the State of Delaware and has had its principal place of
16 business in Charlotte, North Carolina.

17 8. Since before July 13, 2007 and through the present, WSH has been
18 owned entirely by Everen Capital Corporation ("Everen").

19 9. Since before July 13, 2007 and through the present, Everen has been
20 incorporated under the laws of the State of Delaware and has had its principal place of
21 business in Charlotte, North Carolina.

22 Executed this 16th day of October, 2007 at New York, New York.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct.

25 
26 PAUL WALDMAN